



POM 203:

Orientation:

Pharmacist Responsibility

Applies To	All pharmacy associates of Wal-Mart Stores, Inc. and its U.S. subsidiaries ("Walmart"), including Sam's Club and Puerto Rico associates.
Introduction	<p>Pharmacists are valuable members of Wal-Mart Stores, Inc.'s Health and Wellness team. One of Wal-Mart Stores, Inc.'s goals is for its patients and customers to trust pharmacists to deliver professional, confidential, competent pharmacy services and health care advice. As a professional in a highly regulated profession, Wal-Mart Stores, Inc., pharmacists not only must remain current on changes in drug therapy, but also must understand and adhere to all state and federal laws related to the practice of pharmacy.</p> <p>In addition, professional judgment is an important element of any pharmacist's practice. Not all situations and decisions are clearly outlined in federal and state law, and federal and state law do not address every situation in a straightforward manner. Pharmacists must exercise sound, professional judgment in meeting the standard of care to the patient and in making many decisions in the pharmacy.</p> <p>Wal-Mart Stores, Inc. is committed to preventing the diversion of controlled substances from legitimate medical channels. It is the responsibility of all associates to prevent diversion. Regulatory agencies expect pharmacists to identify situations demonstrating red flags and to refuse to fill prescriptions not issued for a legitimate medical purpose (refer to <u>POM 1703</u> and <u>POM 1311</u>). Failing to recognize and react to situations related to prescriptions issued without a legitimate medical purpose places the patient, health care providers and Wal-Mart Stores, Inc. at risk.</p> <p>Pharmacists must be mindful of applicable laws and apply appropriate professional ethics when making decisions not specifically outlined in law or corporate policy.</p> <p>Consulting with peers or other members of the healthcare team may assist in the decision-making process. Any consultations should be done in a confidential and legally appropriate manner to protect patients' privacy.</p> <p>Accordingly, Wal-Mart Stores, Inc. pharmacists have overlapping responsibilities to patients, to healthcare providers and to Wal-Mart Stores, Inc. Below is a non-exclusive list of the pharmacist's responsibilities to those constituencies, along with nonexclusive examples of when the exercise of professional judgment may be appropriate.</p>
Pharmacist Responsibility and Professional Judgment	<p>Responsibility to the Patient</p> <p>To the patient, pharmacists represent the image of professional service and immediate assistance. Wal-Mart Stores, Inc. pharmacists' responsibilities include but are not limited to:</p> <ul style="list-style-type: none"> • Provide patients with accurate and efficient preparation of drugs



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according to prescribers' requests.

- Provide accurate third party claims submissions.
- Monitor appropriate inventory levels, including whether all medication is properly stored and in-date.
- Counsel patients appropriately, including complying with counseling guidelines in HIPAA, OBRA '90 legislation and individual states' Pharmacy Practices Act(s).
- Advise patients on the proper use, storage and disposal of prescription and non-prescription products.
- Fill prescriptions accurately and as quickly as possible. In providing excellent Customer Service, notify patients if any prescription will take longer than expected or is out of stock.
- Use professional judgment when determining whether to approve or deny the early refill of either legend or controlled substance prescriptions.
- Price prescriptions for patients requesting a quote; Wal-Mart Stores, Inc.'s goal is to have the lowest everyday price while complying with pricing laws.
- Maintain patients' confidentiality in handling their health information.
- Uphold high professional standards.
- Keep updated on the latest knowledge and skills of pharmacy.
- Represent products and services truthfully.

Responsibility to Healthcare Providers

To other healthcare professionals, pharmacists' responsibilities include but are not limited to:

- Maintain a professional relationship with local prescribers.
- Furnish information concerning medications and drugs to physicians and nurses, when requested and in accordance with federal, state, and local laws and regulations to maintain confidentiality.
- Support local efforts on behalf of public health and safety.
- Consult with physicians on the proper use and dispensing of drug products.
- Use professional judgment in determining whether to dispense a prescription that is written outside the manufacturer's suggested dosage range.

Responsibility to Wal-Mart Stores, Inc.

To Wal-Mart Stores, Inc., pharmacists' responsibilities include but are not limited to:

- Read and follow all POMs.
- Maintain appropriate accreditation for the pharmacist's state of practice.
- Comply with all federal, state, and local laws and regulations pertaining to the practice of pharmacy.
- Use professional judgment in determining when to access prescription monitoring databases and how to use the information provided by that database.



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- Use professional judgment in determining when to approve the sale of pseudoephedrine products.
- Check validity of a prescription. This includes questioning any prescription that in the pharmacist's professional judgment is incorrect or fraudulent.
- Use professional judgment in determining whether a valid prescriber/patient relationship exists prior to dispensing a controlled substance.
- Supervise and properly train all supportive personnel in the Pharmacy Department. Supportive personnel includes all non-pharmacist associates.
- Check each prescription for proper contents, complete label, and compliance with regulatory requirements.
- Remove and exclude products from the pharmacy which are defective, outdated, recalled, adulterated, or mis-branded.
- Present a professional image, which includes appropriate attire, personal grooming, display of professional licenses, and an orderly, professional appearance and operation of the Pharmacy Department.
- Participate in continuing education programs, maintaining skill and knowledge in the profession of pharmacy.
- Provide emergency pharmaceutical services based on professional judgment, when a valid emergency exists.
- Keep records in accordance with Company accounting procedures. This includes the General Journal and P&L.
- Notify your Market Director or Ethics Hotline if the pharmacist has any questions or concerns about any POM or Wal-Mart Stores, Inc. policy or procedure.

Many of these issues are addressed in other POMs. A pharmacist's responsibilities are outlined in more detail there.

Conclusion Wal-Mart Stores, Inc. supports pharmacists who exercise sound and appropriate professional judgment. Professional judgment must be used to provide the best quality care for our patients at all times.